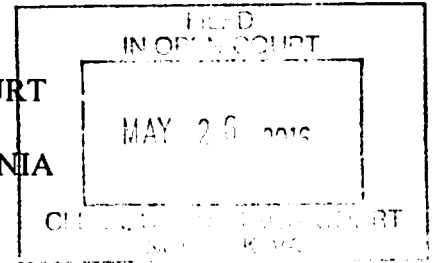


IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA

NORFOLK DIVISION



UNITED STATES OF AMERICA

v.

STEVEN BAZEMORE,

Defendant.

CRIMINAL NO. 2:16cr65

STATEMENT OF FACTS

If this case proceeded to trial, the evidence presented by the United States would establish the following beyond a reasonable doubt:

1. From on or about January 2010 through September 2013, in the Eastern District of Virginia, Steven Bazemore, the defendant, knowingly and intentionally agreed with others to commit the crime of securities fraud.

2. At all material times, defendant was employed by the City of Norfolk as an administrative clerk. Defendant worked at a Virginia Department of Motor Vehicles ("DMV") Select facility. DMV Select facilities are staffed by local government employees, rather than DMV employees, and they provide a variety of motor vehicle related services. As a DMV Select clerk, defendant assisted customers by conducting a variety of DMV transactions, including: issuing Virginia motor vehicle titles, processing title applications, and processing vehicle registrations.

3. Defendant knowingly agreed to process fraudulent title applications for a co-conspirator ("CC1") and other individuals working with CC1. Defendant processed title applications that contained obviously false odometer certifications and frequently were missing

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signatures or other required information. In many instances, the false odometer reading on the title presented by CC1 or another co-conspirator was lower than a previous odometer reading on the same title or a prior odometer reading in the DMV computer system. Defendant entered the title information, including the false odometer reading, into the DMV computer system, causing the system to generate a new title with a false, lower odometer reading.

4. At times, defendant returned the fraudulent title, title application and/or other documents back to CC1 and other co-conspirators, in violation of DMV policy. As a result, those documents were not retained by DMV.

5. In exchange for processing the fraudulent title applications, CC1 and other co-conspirators frequently gave defendant cash.

6. On or about July 24, 2012, at the DMV Select facility in Norfolk, Virginia, CC1 presented to defendant an Application for Certificate of Title and Registration for a 2003 Chevrolet S10 pickup with the Vehicle Identification Number IGCCS14H538285314 (Vehicle 1). The application listed the odometer reading as 84,603 miles. The Georgia title for Vehicle 1, presented with the application, listed the odometer reading as 243,000 miles. Defendant knowingly entered the false lower odometer reading into the DMV computer system, causing the Commonwealth of Virginia to issue a new Virginia motor vehicle title for Vehicle 1 with a false odometer reading of 84,603 miles.

7. On or about February 14, 2013, at the DMV Select facility in Norfolk, Virginia, a co-conspirator requested a new title for a 2003 Honda Acura with the Vehicle Identification Number 9UUA56823A086551 (Vehicle 2). The prior Virginia title for Vehicle 2, issued on February 1, 2013, listed the odometer reading as 211,000 miles. Defendant knowingly entered a false lower odometer reading into the DMV computer system, causing the Commonwealth of Virginia to

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issue a new Virginia motor vehicle title for Vehicle 2 with a false odometer reading of 107,003 miles.

8. The defendant processed at least 76 title applications for his co-conspirators containing false odometer readings.

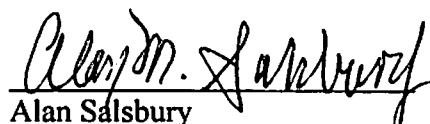
9. As a result of the fraudulent acts committed in furtherance of the conspiracy, more than ten victims suffered losses totaling more than \$150,000.

Dana J. Boente  
United States Attorney

By: 

John W. Burke  
Trial Attorney


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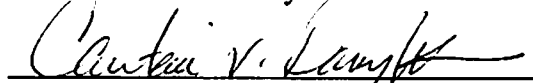
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I hereby stipulate that the above Statement of Facts is true and accurate, and that if this case had proceeded to trial, the United States would have proved the same beyond a reasonable doubt.

  
Steven Bazemore

I have reviewed the above Statement of Facts with Steven Bazemore and his decision to stipulate to the accuracy of these facts is an informed and voluntary one.

  
Carteia Basnight  
Counsel for the defendant

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